

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
**FREEDOM LAW FIRM**  
8985 S. Eastern Ave., Suite 350  
Las Vegas, NV 89123  
Tele. 702.880.5554  
E-fax: 702.967.6666  
Email: info@freedomlegalteam.com  
*Attorneys for Plaintiffs Richard Klein, Raymond Urias,  
and Sandra J. Gunter, individual, and on behalf of all others similarly situated*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Richard Klein, Raymond Urias and Sandra J.  
Gunter, individually and on behalf of all others  
similarly situated,

Plaintiffs,

-vs.-

National Collegiate Student Loan Trust 2005-3, *et*  
*al.*,

Defendant.

CASE NO:2:22-cv-01392-GMN-BNW

**CLASS ACTION**

**STIPULATION AND ORDER FOR  
EXTENDING TIME FOR PLAINTIFFS  
TO RESPOND TO DEFENDANTS'  
MOTION TO DISMISS**

**(FIRST REQUEST)**

**Current Response Date: March 22, 2023  
New Response Date: April 5, 2023**

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, Richard Klein, Raymond  
Urias and Sandra J. Gunter ("Plaintiffs") and Transworld Systems, Inc. ("TSI") and  
National Collegiate Student Loan Trust ("NCSLT") 2005-2, NCSLT 2006-3, NCSLT 2007-  
1, NCSLT 2007-2, and NCSLT 2007-3, and NCSLT 2007-4) (the "Trust Defendants")  
(collectively, "Defendants") (Plaintiffs and Defendants collectively referred to as the "Parties"),

1 by and through their respective counsel of record, hereby stipulate, agree and respectfully request  
2 that the Court extend the deadline for the Plaintiffs to file their responses to the Trust Defendants'  
3 Motion to Dismiss (ECF No. 39) and TSI's Motion to Dismiss (ECF No. 40) from March 22,  
4 2023 to April 5, 2023.<sup>1</sup>

- 5 1. On December 23, 2022, Plaintiffs filed their First Amended Complaint. ECF NO. 20.
- 6 2. On December 28, 2022, Plaintiffs served the Summons and First Amended Complaint on  
7 TSI. ECF No. 23.
- 8 3. On December 29, 2022, Plaintiffs served the Summons and First Amended Complaint on  
9 NCSLTs. ECF No. 24.
- 10 4. Therefore, TSI's original response due date was January 18, 2023 and the Trust  
11 Defendants' original response due date was January 19, 2023.
- 12 5. The Trust Defendants' counsel needed additional to better investigate the new allegations  
13 and the Parties agreed to an extension of time for Defendants to respond to the First  
14 Amended Complaint through and until February 6, 2023. ECF No. 25
- 15 6. TSI counsel needed additional time to evaluate the information necessary to respond to  
16 the Complaint and the Parties agreed to an extension of time for Defendant to respond to  
17 the First Amended Complaint through and until February 6, 2023. ECF No. 26.
- 18 7. Defendants then needed additional time to evaluate the information necessary to  
19 appropriately respond to respond to the First Amended Complaint and the Parties agreed  
20 to extension of time to respond to the First Amended Complaint through and until March  
21 8, 2023.
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27 <sup>1</sup> Both NCSLT's Motion to Dismiss (ECF No. 39) and TSI's Motion to Dismiss (ECF No. 40) were filed on March  
28 8, 2023.

8. On March 8, 2023, the Trust Defendants and TSI filed their respective Motions to Dismiss Plaintiffs' First Amended Complaint ("Motions to Dismiss"). ECF Nos. 39 & 40.

9. Plaintiffs' deadline to respond to these Motions to Dismiss set for March 22, 2023.

10. The Parties have discussed extending the deadline Plaintiffs have to respond to Defendants' Motions to Dismiss in light of the multiple motions to dismiss that have been filed in this case and the complexity of the matter.

WHEREAS, the parties hereby stipulate and agree to extend the deadline for Plaintiffs to file their responsive pleading to Defendants' Motions to Dismiss (ECF Nos. 39 & 40) to April 5, 2023.

IT IS SO STIPULATED.

Dated: March 20, 2023

FREEDOM LAW FIRM

/s/ George Haines

George Haines, Esq.  
Nevada Bar No. 9411  
Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
8985 South Eastern Ave., Suite  
Suite 350 Las Vegas, Nevada 89123

MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC

Scott C. Harris\*  
N.C. Bar No: 35328  
900 W. Morgan Street  
Raleigh, NC 27603  
Telephone: (919) 600-5003  
Facsimile: (919) 600-5035  
[sharris@milberg.com](mailto:sharris@milberg.com)

Dated March 20, 2023

WRIGHT, FINLAY & ZAK, LLP

/s/ Ramir M. Hernandez

Ramir M. Hernandez, Esq.  
Nevada Bar No. 13146  
Darren T. Brenner  
Nevada Bar No. 8386  
7785 W. Sahara Avenue, Suite 200  
Las Vegas, Nevada 89117  
(702) 475-7964; Fax: (702) 946-1345

LOCKE LORD LLP

/s/ J. Matthew Goodin

J. Matthew Goodin  
111 S. Wacker Drive, Suite 4100  
Chicago, Illinois 60606  
(312) 443-0472  
[jmgoodin@lockelord.com](mailto:jmgoodin@lockelord.com)  
Attorneys for the Trust Defendants

SESSIONS, ISRAEL & SHARTLE, LLP

/s/ James K. Schultz

Gary M. Klinger\*  
227 W. Monroe Street, Suite 2100  
Chicago, IL 60606  
Phone: 866.252.0878  
[gklinger@milberg.com](mailto:gklinger@milberg.com)

\*to motion for appearance *pro hac vice*  
*Attorneys for Plaintiffs and the Proposed*  
*Class Attorneys for Plaintiff and on behalf of*  
*all others similarly situated*


SESSIONS, ISRAEL & SHARTLE, LLP  
/s/ James K. Schultz  
James K. Schultz  
Nevada Bar No. 10219  
1550 Hotel Circle North, Suite 260  
San Diego, CA 92108  
Tel: (619) 758-1891  
Fax: (877) 334-0661  
E-mail: [jschultz@sessions.legal](mailto:jschultz@sessions.legal)

SESSIONS, ISRAEL & SHARTLE, LLC  
/s/ Bradley J. St. Angelo  
Bryan C. Shartle – *Pro Hac Vice*  
Bradley J. St. Angelo – *Pro Hac Vice*  
3850 N. Causeway Blvd., Suite 200  
Metairie, LA 70002-7227  
Tel: (504) 828-3700  
Fax: (504) 828-3737  
E-mail: [bshartle@sessions.legal](mailto:bshartle@sessions.legal)  
E-mail: [bstangelo@sessions.legal](mailto:bstangelo@sessions.legal)

LINCOLN, GUSTAFSON & CERCOS LLP  
Shannon G. Splaine, Esq.  
Nevada Bar No. 8241  
3960 Howard Hughes Parkway, Suite 200  
Las Vegas, NV 89169-5968  
Tel: (702) 257-1997  
Fax: (702) 257-2203  
E-Mail: [ssplaine@lgclawoffice.com](mailto:ssplaine@lgclawoffice.com)

*Attorneys for Transworld Systems Inc.*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

Dated: March 21, 2023